UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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NOV 10 2014

Ref: EPR-N

Ms. Julie K. King, Forest Supervisor
Bitterroot National Forest
c/o Chuck Oliver, Darby District Ranger
P.O. Box 388
Darby, MT 59829

RE: Como Forest Health Project, Draft Environmental Impact Statement, CEQ #20140273

Dear Ms. King:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA), 42 U.S.C. Section 4321, and Section 309 of the Clean Air Act, 42 U.S.C. Section 7609, the U.S. Environmental Protection Agency Region 8 (EPA) has reviewed the August 2014 Draft Environmental Impact Statement (EIS) for the Como Forest Health Project. This Draft EIS was prepared by the Darby Ranger District in the Bitterroot National Forest, Montana, to analyze potential environmental impacts associated with proposed treatments to address impacts from the mountain pine beetle epidemic.

Background

The Bitterroot National Forest is located approximately 6 miles northwest of Darby, Montana, and just north of the Lake Como Recreation Area. The Lake Como Recreation Area serves recreationists from Ravalli and Missoula Counties in Montana and Lemhi County in Idaho. The project area is 5,711 acres, including 1,680 acres of Ponderosa pine and 47 acres of Lodgepole pine forest. The purpose of the project is to reduce the forest susceptibility to mountain pine beetle caused mortality, reduce fuel loads and restore historical fire return intervals, improve forest resilience to insects and disease, and maintain the visual integrity of the larger Lake Como Recreation Area.

Alternatives analyzed in the Draft EIS are briefly summarized, as follows:

- Alternative 1 (No Action) – No timber harvest, thinning, road construction or reconstruction, or prescribed fire would be implemented to accomplish the Como Forest Health project goals. Current management plans would continue in the project area.

- Alternative 2 –This alternative includes treatment on 1,680 acres of Ponderosa pine and seven acres of Lodgepole pine forest to reduce susceptibility to mountain pine beetle infestation, treatment of 183 acres to reduce dwarf mistletoe and Douglas-fir beetle hazard, commercial timber harvest on 1,295 acres, low and moderate severe prescribed fire treatments on 3,320 acres (2,236 at the Wildland Urban Interface), and 1.7 miles of new road construction/2 miles of

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temporary road construction.

- Alternative 3- In response to public comments, no new or temporary roads would be constructed under this alternative. The alternative includes treatment on 2,034 acres of Ponderosa pine and seven acres of Lodgepole pine forest to reduce susceptibility to mountain pine beetle infestation, treatment of 183 acres to reduce dwarf mistletoe and Douglas-fir beetle hazard, commercial timber harvest on 1,295 acres and 929 acres of non-commercial thin treatments. Low severity prescribed fire would follow most of the treatments on the non-commercial units.

- Alternative 4- Under this alternative 1,842 acres of Ponderosa pine forest would be treated to reduce susceptibility to mountain pine beetle infestation and 45 acres treated to reduce dwarf mistletoe and Douglas-fir beetle hazard. Conifers would be girdled or thinned from about 39 acres of aspen to rejuvenate aspen clones (to promote wildlife habitat diversity). Commercial timber harvest would occur on 1,117 acres or the remaining 770 acres would be non-commercial thin treatments. Low severity prescribed fire would follow most of the treatments in commercial harvest units. Approximately 0.7 miles of new system road, 1.2 miles of temporary road, and 0.5 mile of tracked line-machine trail would be constructed to access timber.

The EPA's comments are specific to aquatic and air resources. Our "Lack of Objections" or "LO" rating is discussed at the end of this letter.

Aquatic Resources

The EPA considers protection of aquatic resources to be among the most important issues addressed in any NEPA analysis for vegetation management projects in our national forests. Most treatments contemplated under the proposed action (e.g., commercial and non-commercial harvest, thinning, pile burning, treatments for beetle infestation, and road construction) have the potential to adversely impact aquatic resources, including surface and ground waters, wetlands, streams, riparian areas, and their supporting hydrology. We are providing recommendations related to specific water resources and/or management actions, as discussed below.

Existing Conditions

The Draft EIS provides a good narrative description of existing aquatic conditions in the project area (watershed and sub-basin-wide) and describes projected impacts to the aquatic resources from the proposed project. We are pleased that a GIS Assessment and the Water Erosion Prediction Process (WEPP) model were used to determine the potential erosion and sediment production locations and intensity.

Given the potential for this vegetation management/forest health project to affect aquatic resources, particularly in the vicinity of the Lick Creek Subwatershed (where 32% of its area will be treated with vegetation management activities), we recommend that the Final EIS include the following information:

- Available data and maps of existing aquatic resources, including quality and location of resources, i.e., wetlands, streams (intermittent, perennial, and ephemeral), rivers, lakes, reservoirs, and surface water drinking water sources; watershed conditions; water quality

conditions; sediment loads; streambank conditions; vegetation cover; and fish population health and habitat. We note that a thorough narrative description, including a discussion of existing conditions, was included in Section 3.7 but inclusion of maps will augment the analysis contained in this section.

- A map and list of Clean Water Act (CWA) Section 303(d) impaired or threatened water body segments within, or downstream of, the project area, including the designated uses of the water bodies and the specific pollutants of concern. We note that only a discussion was included for the CWA Section 303(d) impaired Lick Creek and anticipated impacts based on the WEPP model and updated field surveys. Maps would also augment the analysis in this section.
- A map of municipal watersheds and designated source water protection zones, if any.

Design Criteria and Monitoring Plan

The Draft EIS includes an extensive Best Management Practices (BMPs) reference and project-specific design criteria proposed to protect aquatic resources (particularly those designed for susceptible Lick Creek subwatershed sediment reduction), including requirements for road construction to avoid wetlands and riparian habitat conservation areas. We recommend expanding the avoidance areas to include ground water-dependent ecosystems (e.g., fens and springs), slopes greater than 20% and areas with sensitive soils.

We are pleased to see that treatment of the three largest sources of sediment found in the Lick Creek subwatershed that would reduce cumulative effects and improve long-term beneficial use support are included in all action alternatives. To ensure that proposed project activities do not adversely impact aquatic resources, we also recommend that the project-specific design criteria include the following:

- Construct unavoidable road stream crossings during periods of low flow to avoid fish spawning and incubation periods, and/or dewater relevant stream segments prior to construction;
- Specify steps to protect range improvements such as water developments and spring enclosures;
- Monitor impacts to water quality when treatments are proposed adjacent to high value surface waters (Lake Como reservoir), and adjust BMPs/design criteria, if necessary;
- Monitor effectiveness of road closures and adjust closure methods, if necessary; and
- Monitor revegetation efforts for 5 years or until success is achieved.

Effects to Impaired Water Bodies

The primary water resource in the project area is Lick Creek and its tributaries. It is listed on the Montana Department of Environmental Quality (MDEQ) 2012 303(d) list of Impaired Waterbodies. Sediment modeling and mitigation measures/BMPs suggest activities would produce only a minor net change and are not likely to cause further water body degradation from the primary impairment sources of siltation and nutrients.

TMDLs for sediments, nutrients and temperature were developed for the streams in the analysis area in 2011. The EPA notes that the USFS has entered into a Memorandum of Understanding with the State of Montana to follow BMPs applied directly as design features for this proposal. Implementation and effectiveness monitoring which is conducted by USFS representatives routinely and during annual

monitoring events are considered a necessary part of all alternative proposals to assure State and Federal exceedances do not occur.

Water Quality Impacts of Beetle Epidemic

The presence and handling of beetle-killed trees has the potential to impact public water supplies if it leads to organic loading of area water bodies that are sources of drinking water. Organic matter interacts with disinfectants used in the drinking water treatment process to form disinfection byproducts, which are a human health concern. Organic loading may also decrease oxygen levels leading to the release of metals such as arsenic, manganese, and iron from sediments. If the project area contains any public drinking water supply reservoirs, then we recommend that the Final EIS identify the reservoirs and provide an assessment of the potential for organic loading impacts to such drinking water supplies.

Air Resources

The emissions calculations for all of the alternatives are below the Montana Ambient Air Quality Standards and EPA's National Ambient Air Quality Standards. The air quality analysis method used to estimate smoke emissions indicates that the proposed alternative would most effectively reduce potential smoke emissions and associated pollutants and reduce impacts to people and communities as compared to uncontrolled wildfires. The Draft EIS notes that all prescribed fire proposed in Montana is reviewed and coordinated through the Idaho/Montana Airshed Group which regulates emissions through a burn approval process and monitoring program. Further, the annual MDEQ smoke permit requires burners to implement Best Available Control Technologies taking into account impacts on energy use, the environment, and the economy. Inclusion of mitigation techniques and methods recommended by MDEQ in the Air Quality Section of this document is useful in understanding the joint agency responsibilities in air quality management.

The EPA's Rating

Based on the procedures the EPA uses to evaluate the adequacy of the information and the potential environmental impacts of the proposed action, the EPA is rating this Draft EIS as Lack of Objections (LO). The "LO" rating indicates the review has not identified any potential environmental impacts requiring substantive changes to the proposed action, but the review has disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposed action. Because a preferred alternative was not identified in the Draft EIS, we are rating the Draft EIS based on Alternatives 2, 3 and 4 (we do not rate the no action alternative).
Please refer to http://www.epa.gov/compliance/nepa/comments/ratings.html for a description of the EPA's rating system.

We appreciate the opportunity to review this Draft EIS. If we may provide further explanation of our comments, please contact me at 303-312-6704, or your staff may contact Robin Coursen at 303-312-6695.

Sincerely,

Philip Strobel, Acting Director
NEPA Compliance and Review Program
Office of Ecosystems Protection and Remediation